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MEMO ENDORSED

March 30, 2021

BY ECF

The Honorable Edgardo Ramos
United States District Judge
United States District Court
Southern District of New York
40 Centre Street
New York, NY 10017

Re: *United States v. Frank Brandon, et al.*
Criminal Docket No. 19-79 (ER)

Dear Judge Ramos:

The May 3 trial is adjourned. The April 29 pretrial conference is rescheduled for April 27, 2021, at 12:00 p.m. The conference will occur remotely and by telephone. The parties are instructed to call (877) 411-9748 and enter access code 3029857# when prompted.

SO ORDERED.

Edgardo Ramos, U.S.D.J.

Dated: _____
New York, New York

This letter is respectfully submitted on behalf of the defendant, Frank Brandon, to request an adjournment of the trial date in this matter, currently scheduled for May 3, 2021. The adjournment is necessary to enable counsel to fully review the more than ten thousand pages of new discovery recently produced by the Government, as detailed in letters to the Court dated January 25, 2021 and subsequent letters to counsel dated February 9, February 22 and March 4, and to conduct any additional investigation required as a result of the new discovery. At the current time, defense counsel cannot estimate how much additional time we will need to complete our review of the new discovery and conduct the additional investigation. We therefore propose that the parties appear at the pretrial conference currently scheduled for April 29, 2021 at 2:30 p.m., at which time the parties can discuss a new schedule, including a new trial date, with the Court.

We have discussed the requested adjournment and this proposal with AUSA Bracewell and Davis who advised us that the Government has no objection to the adjournment.

Thank you in advance for your consideration of this request.

Respectfully submitted,

Avraham C. Moskowitz

cc: All Counsel of Record (by email)